

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Alonzo M. Whiteside,

Case: 4:23-mj-30342

Assigned To : Ivy, Curtis, Jr

Assign. Date : 8/18/2023

Description: IN RE SEALED MATTER (kcm)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 13, 2023 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2113(a)

Bank Robbery

18 U.S.C. § 924(c)(1)(A)(ii)

Brandishing a firearm during and in relation to a crime of violence

This criminal complaint is based on these facts:

I have probable cause to believe that on or about July 13, 2023, in the Eastern District of Michigan, Alonzo M. Whiteside, violated 18 U.S.C. § 2113(a) bank robbery and 18 U.S.C. § 924(c)(1)(A)(ii) brandishing a firearm during and in relation to a crime of violence.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

August 18, 2023

Date: \_\_\_\_\_

City and state: Flint, MI

Complainant's signature

Stacey Moore, Task Force Officer, FBI

Printed name and title



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A  
CRIMINAL COMPLAINT**

I, Stacey Moore, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Task Force Officer (TFO) within the Federal Bureau of Investigation (FBI), United States Department of Justice, currently assigned to the FBI's Detroit Division-Flint Resident Agency (FLRA). I have been employed by the Michigan State Police (MSP) since July 1999. I have conducted multiple robbery investigations during my career.

2. During my tenure with MSP and FBI Task Force, I have participated in numerous violent crime investigations and have executed numerous search warrants connected to those investigations. I have executed search warrants for both the state and federal courts, which have resulted in arrests and the recovery of pertinent evidence related to homicides, extortions, kidnappings, bank robberies, child pornography, drug trafficking and other major offenses. I have experience in the investigation, apprehension, and prosecution of individuals involved in federal criminal offenses.

3. I make this affidavit from personal knowledge based on my participation in this investigation, communications with others who have personal knowledge of the events and circumstances described herein, my review or reports and statements of the events described below, evidence gathered by the Flint

Township Police Department, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

4. I submit this affidavit in support of an application for a criminal complaint charging Alonzo M. Whiteside (Whiteside), date of birth XX/XX/1982, with bank robbery in violation of 18 U.S.C. § 2113(a) and with brandishing a firearm during and in relation to a crime of violence in violation of 18 U.S.C. 924(c)(1)(A)(ii).

#### **SUMMARY**

5. On July 13, 2023, a man brandished a pistol while robbing a Huntington Bank branch in Flint Township. Two victim tellers gave the robber cash and a dye pack. One victim teller identified Alonzo M. Whiteside in a photographic line-up. Another victim teller identified the robber's get-away car as a white Mercedes-Benz. Whiteside has a white Mercedes-Benz registered to him, and officers recovered the car near the bank with a red powder on the passenger seat. The powder appeared consistent with the explosion of the bank's dye pack.

### **PROBABLE CAUSE**

6. On July 13, 2023, an armed bank robbery occurred at the Huntington Bank branch located at 1373 S. Linden Road., Flint Township, Michigan. A man wearing a black mask over his face produced a pistol and approached the teller counter demanding money from a teller (Victim-1).

7. Victim-1 gave the man money from her register, and also put a dye pack in the bag with the money. The images below depict the robber at Victim-1's teller area and are from the bank surveillance system.



8. Another bank teller (Victim-2) was at a teller area next to Victim-1. While robbing Victim-1, the robber also directed Victim-2 to give him money. Victim-2 complied with the robber.

9. Facial recognition software provided law enforcement with a possible suspect identified as Alonzo Marqueco Whiteside, date of birth XX/XX/1982. Whiteside was previously convicted of armed robbery and bank robbery in Oakland County Circuit Court in Michigan.

10. Police officers conducted a photographic line-up with Victim-1. Victim-1 identified a photo depicting Whiteside as the person who robbed the bank.

11. Officers also spoke to Victim-2, who described the robber's get-away car as a white Mercedes-Benz with factory wheels.

12. Officers reviewed video surveillance footage from the bank and images captured around the time of the robbery from nearby license-plate-reader cameras. Based on the license-plate-reader images and information from Victim-2, officers determined the get-away car was a white Mercedes-Benz, model CLA 250. The license-plate-reader images showed the Mercedes-Benz bearing a Michigan license plate. The Michigan plate, however, was not registered to a Mercedes-Benz and was instead registered to a different make and model vehicle.

13. Michigan Secretary of State records indicate that Whiteside is the registered owner of a Mercedes-Benz, with an Oklahoma registration JHN273.

14. Officers located a 2014 Mercedes-Benz CLA 250, with Oklahoma registration plate JHN273, in a parking lot approximately a half mile from the Huntington Bank. Officers observed a red powder covering the passenger seat. The powder was consistent with the detonation of the bank's dye pack. The vehicle is depicted in the images below. The second image shows the red dye on the passenger seat.





15. Based on my training and experience, I know people involved with illegal activities will often switch license plates on get-away cars to hinder investigators. I know, that other than the license plate, the recovered Mercedes-Benz registered to Whiteside appeared identical to the Mercedes-Benz depicted in the license-plate- reader images.

16. Officers went to Whiteside's registered address. Officers spoke to a person (identified herein as Witness-1) who was at the home. Witness-1 said Whiteside stayed with him/her for a few days in the beginning of July, and Whiteside had left on July 11 or 12, 2023. Witness-1 said he/she had not seen or spoken to Whiteside since then. Witness-1 allowed officers to review footage from the home's doorbell camera. Footage from July 10, 2023, showed Whiteside exit the house and walk towards a white Mercedes-Benz CLA 250 parked in the driveway.



17. Witness-1 identified a person (referenced herein as Witness-2) as having a romantic relationship with Whiteside.

18. Officers spoke with Witness-2. Witness-2 gave Officers consent to look at his/her cellular phone. On the phone were searches for “Bank Robberies in Flint” and “Bank Robberies in Flint Township.”


19. Based on my training and experience, I am aware the deposits of Huntington Bank are insured by the Federal Deposit Insurance Corporation (FDIC), and that Huntington Bank is a bank within the meaning of 18 U.S.C. § 2113(f).

20. Based on the information above, there is probable cause that on July 13, 2023, in the Eastern District of Michigan, Alonzo M. Whiteside, took by force and violence, or by intimidation, money belonging to a bank, in violation of 18 U.S.C. § 2113(a). There is also probable cause that on July 13, 2023, in the Eastern District of Michigan, Alonzo M. Whiteside used and brandished a firearm during and in relation to a crime of violence for which Whiteside may be prosecuted in a




court of the United States, in violation of 18 U.S.C. § 924(c)(1)(A)(ii).

I declare that the foregoing is true and correct.

  
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Stacey Moore  
Task Force Officer  
Federal Bureau of Investigation

This affidavit was submitted and received by reliable electronic means and was attested to by the affiant telephonically.

Sworn to before me this 18<sup>th</sup> Day of August, 2023.

  
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Honorable Curtis Ivy, Jr.  
United States Magistrate Judge